

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE DEPARTMENT OF THE TREASURY
OF THE STATE OF NEW JERSEY AND ITS
DIVISION OF INVESTMENT, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

CLIFFS NATURAL RESOURCES INC.,
JOSEPH CARRABBA, LAURIE BRLAS,
TERRY PARADIE, and DAVID B. BLAKE

Defendants.

Civ. A. No. 14-CV-1031-DAP

Judge Dan Aaron Polster

Magistrate Judge Greg White

**STIPULATION REGARDING ANSWER TO THE
SECOND AMENDED COMPLAINT**

Lead Plaintiff, the Department of the Treasury of the State of New Jersey and its Division of Investment, and defendants Cliffs Natural Resources Inc., Joseph Carrabba, Laurie Brlas, Terry Paradie, and David B. Blake (“Defendants”), hereby stipulate and agree that Defendants shall have until December 21, 2015, to file their answer to the Second Amended Complaint (Doc. No. 55).

DATED: November 19, 2015

/s/ Scott D. Simpkins

John R. Climaco (0011456)

Scott D. Simpkins (0066775)

CLIMACO WILCOX PECA TARANTINO
& GAROFOLI CO., LPA

55 Public Square, Suite 1950

Cleveland, OH 44113

Telephone: (216) 621-8484

Facsimile: (216) 771-1632

jrclim@climacolaw.com

sdsimp@climacolaw.com

*Local Counsel for Lead Plaintiff, the
Department of the Treasury of the State of
New Jersey and its Division of Investment*

Michael B. Himmel (*admitted pro hac vice*)
Michael T.G. Long (*admitted pro hac vice*)
Jamie Gottlieb Furia (*admitted pro hac vice*)
Joseph A. Fischetti (*admitted pro hac vice*)
LOWENSTEIN SANDLER LLP
65 Livingston Avenue
Roseland, New Jersey 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-2400
mhimmel@lowenstein.com
mlong@lowenstein.com

Gerald H. Silk (*admitted pro hac vice*)
James A. Harrod (*admitted pro hac vice*)
Rebecca E. Boon (*admitted pro hac vice*)
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 554 1400
Facsimile: (212) 554 1444
jerry@blbglaw.com
jim.harrod@blbglaw.com
rebecca.boon@blbglaw.com

*Co-Counsel for Lead Plaintiff, the Department
of the Treasury of the State of New Jersey and
its Division of Investment, and Lead Counsel
for the Putative Class*

/s/ John M. Newman, Jr.

John M. Newman, Jr. (0005763)
Geoffrey J. Ritts (0062603)
Adrienne Ferraro Mueller (0076332)
JONES DAY
901 Lakeside Avenue
Cleveland, Ohio 44114-1190
Telephone: 216.586.3939
Facsimile: 216.579.0212
jmnewman@jonesday.com
gjriffs@jonesday.com
afmueller@jonesday.com

*Counsel for Defendants Cliffs Natural
Resources Inc., Joseph Carrabba, Laurie
Brlas, Terry Paradie, and David B. Blake*